

Exhibit E

Gerard Patrick Ahearn

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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GERARD PATRICK AHEARN, et al.,

Plaintiffs,

AFFIDAVIT OF
GERARD PATRICK AHEARN

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF SUFFOLK)

GERARD PATRICK AHEARN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 56 Skylark Drive, Holtsville, NY 11742.

2. I am currently 30 years old, having been born on February 26, 1992.

3. I am the son of Gerard Anthony Ahearn, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from Stage IV colon cancer on October 24, 2016, at the age of 52. It was medically determined that this illness was connected to his exposure to toxins resulting from the September 11, 2001 terrorist attacks.

5. My dad and I had a typical close father-son relationship. He was my football coach and was a very present parent. I am a childhood cancer survivor. I had cancer three times, in 2004, 2006, and 2010. My dad was always there for me. He drove me to doctors' appointments and stayed with me in the hospital every single night. My dad was there for everything. He was my everything and had a huge impact on me.

6. My father was an NYPD Detective. He drove us to school on the day of 9/11/2001—I remember that vividly. Then, he went to work and didn't come home for about a week. He worked for thirty-three days in the "pit." He was there every day. He came home to shower and went right back to the World Trade Center site. He knew right away there was something wrong with all the dust and debris at Ground Zero. He would change clothes in the driveway and leave them in the trunk of his car. Our great uncle owned a bar called Suspenders near Ground Zero in the Financial District. It was an old firefighters' and cops' bar. All the first responders would go to that bar to gather when the recovery effort started. My dad used to sleep on the floor of Suspenders before getting up to work on the pile again.

7. I was in college at the time my father was diagnosed with colon cancer. My mom had called me a few times while I was at work, but she didn't text me, so I knew something wasn't right. I knew my dad was having stomach issues and stomach pain, but I didn't think it could be cancer. But my dad recognized that he wasn't feeling well. He was the union delegate for his precinct, so he'd go to regular union checkups. They didn't see his cancer in the regular screening, but he kept going back because he didn't feel right. That's when they found it.

8. I was a junior at the time and was about to leave for study abroad. I really wanted to go. I would be going to England, and I had worked hard to get accepted to this program. But with my dad's cancer, I was considering staying home. My dad told me, you have to go abroad. The whole time I was in England, I kept in touch with my parents to make sure my dad was okay. In the back of my mind, I was constantly worrying about him. I came home and knew I had to take care of my family. My mom was a teacher in Brooklyn, and my dad couldn't work anymore because of his illness, so I knew I needed to pitch in to take care of our family. I was going to start a career in film, but I put that on pause.

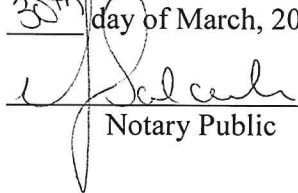
9. My mom was working and my siblings were in college, so my dad was home alone all day and needed someone to be with him. I took a night shift job at Whole Foods so that I could be with my dad during the day. I drove him to doctor's appointments, fed him, gave him his medications, and helped him with his colostomy bag. I drove him to Long Island Jewish Hospital for his treatments. It was the same hospital he used to drive me to when I had cancer as a kid. He was there for me when I had cancer, and now I was there for him.

10. My dad always wanted to have a beach house or a lake house. After he got sick, he found one in Pennsylvania. I became so busy with working, and eventually studying for law school, that I could only go with him once. I would take him for chemotherapy treatment and then my mother and siblings would drive him out to Pennsylvania to relax. I lost a lot of time with him. I started studying for the LSAT and learning about law while sitting in cancer treatment waiting rooms. After two years of that, my dad encouraged me to go to law school. I started law school after he passed away. I remember being so stressed throughout law school and wishing my father was there to support me. I remember seeing everyone else's parents with them on the day I took the bar exam, and I wished my dad could have been there. Even just going on vacation or going to Disney World, it's not the same without him. Even today we still have his car in the driveway. I walk by it every day.

11. My dad worked hard and wanted to have a good life in retirement. He achieved his goals, but never got to live out his retirement. There was so much he wanted out of life that he was never able to enjoy. We have lost so much time with our father. I have no choice but to figure out what life is like without him. We can only think about what would have been.


GERARD PATRICK AHEARN

Sworn to before me this
30th day of March, 2022


Notary Public

Yisell M. Salcedo
Notary Public, State of New York
No. 015A6377501
Qualified in Suffolk County
Commission Expires July 2, 2022

Kristen Mary Ahearn

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
KRISTEN MARY AHEARN**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF SUFFOLK)

KRISTEN MARY AHEARN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 56 Skylark Drive, Holtsville, NY 11742.

2. I am currently 24 years old, having been born on May 22, 1997.

3. I am the daughter of Gerard Anthony Ahearn, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from Stage IV colon cancer on October 24, 2016, at the age of 52. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. We had a very good father-daughter relationship. My dad encouraged me in every way. As I grew up, I did school choir, stage crew, and drama club. He came to every single performance, even the ones I wasn't on stage for. He kept every playbook that my name appeared in. He had a big influence on my music taste, and I loved listening to songs with him. We would have breakfast together on the weekends and run errands together. We loved to just spend time together.

6. I was only in preschool on 9/11. I knew that something was going on and that my dad worked in the city. My grandma used to watch me in the morning, and she came to pick me up from school, saying that we have to leave. She was frantically trying to call my dad, but the phone lines were down. We learned that my dad was alive, but that he had to stay near Ground Zero and work. He was at the World Trade Center site for days at a time. When he finally came home, he explained it the best he could to a young child. He told me that bad people had crashed a plane into a building, and that he was helping get people out of that building. He would change clothing in the driveway, he would never bring his clothes inside. I remember that vividly.

7. When I was living at home, my bedroom was right next to the bathroom. In high school, my dad would be in the bathroom all the time. I knew he had stomach issues and stomach pain, I figured it was just a virus or something. He sat us down one day and told us me that he had colon cancer. I was shocked, because I didn't think it would be something as serious as cancer. I was also upset because I was a senior in high school and my brothers weren't home, so I had to go through this without my siblings there. I was also scared because I didn't know if my dad was going to live.

8. I was only seventeen years old when my dad was diagnosed with cancer. Every day, I had to figure out how to go to school and act like everything was okay. I didn't want to tell my friends and classmates how bad my dad's illness was actually getting. It was a constant pull—should I enjoy my senior year of high school with friends, or do I stay home with my father? I always wanted someone to be home with him. I tried to help him as much as I could, make him comfortable, run errands, get groceries, clean towels, things like that. I felt lost, not knowing what to do. It was really hard.

9. My dad had surgery two weeks before my high school graduation, so he couldn't go to that. He couldn't go to where we were taking my prom pictures. He passed away in the beginning of my sophomore year at college. He never got to see my college graduation. I'm going to graduate soon with my master's degree, and he won't get to see that either. He'll never see me get married or see me flourish in my career. I'm stuck wondering, "Is this what my dad would have wanted me to do?" I feel cheated, in a way. You always see pictures of everyone

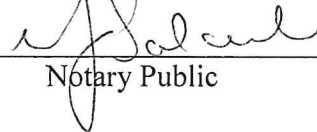
else with their parents at their graduation or wedding. It's hard to know that I won't have that. I often think of what could have been.

10. My dad always worked hard to make sure that we had everything we needed and given every opportunity to thrive in life. It is heartbreaking that cancer robbed him of the chance to see his vision come true. I know he's looking down and is so proud of us, but it's just not the same as having him here to share it with.



KRISTEN MARY AHEARN

Sworn to before me this
30th day of March, 2022


Notary Public

Yisell M. Salcedo
Notary Public, State of New York
No. 015A6377501
Qualified in Suffolk County
Commission Expires July 2, 2022

William Robert Ahearn

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
WILLIAM ROBERT AHEARN**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF SUFFOLK)

WILLIAM ROBERT AHEARN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 56 Skylark Drive, Holtsville, NY 11742.

2. I am currently 26 years old, having been born on July 27, 1995.

3. I am the son of Gerard Anthony Ahearn, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from Stage IV colon cancer on October 24, 2016, at the age of 52. It was medically determined that this illness was connected to his exposure to toxins resulting from the September 11, 2001 terrorist attacks.

5. My father was very involved in our childhood. He was my football coach, and he always took me to travel league games. He made time for all of us, even when my brother Gerry was in the hospital battling cancer. He recognized that while Gerry's cancer was a difficult struggle and took up a lot of his time, he never wanted me to feel forgotten. During Gerry's cancer battle, we spent all of our free time visiting him in the hospital. I remember it being a 45-minute drive each way, 3 or 4 times a week. Thankfully, he recovered from the 3 cancer battles

he suffered through. It was such a relief to the family.

6. When we were all in high school, I would always help my dad out around the house. He was always there for me in high school and in college. He came to every football game, every wrestling match. He'd always come pick me up for school on breaks and drive me home. I started noticing at the end of my freshman year of college that my dad was acting a little different, but I didn't give it much thought at the time.

7. I was only 6 years old on 9/11. I saw a lot of things on TV that I didn't understand. All I knew was that I didn't see my dad for a bit. I remember a kid my age saying something about the Twin Towers being hit, and I thought, "Huh, my dad works there." It wasn't until I was about 16 years old that I asked my dad about it. My dad was in the NYPD. He told me about how he went into the North Tower to get people out. He told me about the people he saw jumping out of the burning towers. He told me about his friend Chip, who was never found. I never asked more than that, because I didn't want to know. My dad worked at the World Trade Center site for 4 to 6 weeks. I knew the story about Suspenders, the bar that my uncle owned. It was a gathering place for NYPD in the Financial District. They all stayed there when 9/11 happened, sleeping on the floor between shifts on the pile.

8. I was going into my sophomore year of college when I learned about my dad's cancer. I was packing my car, getting everything ready. My parents sat me down outside, and my dad said that he had cancer. It was a rough semester to say the least. Thoughts were constantly racing through my mind, and it was hard to remain in school with all that was going on at home. It was obvious that his condition was worsening. Late at night, I would hear him rushing into the bathroom and could hear him groaning. He was constantly holding his stomach and would complain that he had stomach pain. And he was sleeping much more than usual.

9. When I came home to visit from college, our home had a different feeling. There was fear and anxiety in the air. My dad was getting progressively worse. After his first round of chemotherapy, he seemed okay. But his cancer came back my senior year of college, and it hit him even harder the second time around. It became extremely difficult for me to focus on school. I let my grades slip and was put on academic probation. My dad always said, "Don't worry about me, focus on your studies." That was a lot easier said than done. We all dared to have hope when my father got better after the first round of treatment. I would talk to my dad on

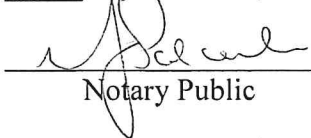
the phone almost every day. But I then noticed that things were again taking a turn for the worse, and I had to mentally prepare myself for the rollercoaster ride of emotions. I tried to help him at home as much as I could, picking up his medications, driving him to appointments, and running errands for him.

10. My father passed away when I was a senior in college. It was my first semester, and I was working on my senior thesis. I remember getting the phone call about his death and rushing back home. I thought to myself, "I've been working for four years to create this project that my dad will never get to see." My senior thesis presentation and college graduation were back-to-back, and not having him there was devastating to me. It took the whole semester to come to terms with that. My dad saw my brother Gerry graduate in the same stadium, from the same university, with the same major. So, it stung to know that my dad wouldn't be there when it was my turn. I remember that Bon Jovi played a song at my graduation. I know my dad would have enjoyed seeing him perform. But, even in the somber times, we tried to keep things light-hearted because that's what our dad would have wanted. We think about those moments, what he had missed. It still hurts.

11. There are three of us siblings. We've lived in the same house our entire lives, but we have three unique and different stories with our father. He always tried to give us the things he didn't have growing up. He wasn't very vocal about his childhood, but we knew that he didn't have a lot when he was a kid. What we have today is so much more than what he had in his childhood. But he never complained about it. He just gave his all to make sure our lives were better.

12. I think about my dad every day. All he endured throughout his life; and then in his prime, when my brother had recovered and all seemed as though it was going to be fine, he got sick because he simply did what he loved and wanted to help people. It was just so unfair. He will always be my hero, and I will miss him every day of my life.

Sworn to before me this
30th day of March, 2022



Notary Public



WILLIAM ROBERT AHEARN

Yisell M. Salcedo
Notary Public, State of New York
No. 01SA6377501
Qualified in Suffolk County
Commission Expires July 2, 2022

Alfred Joseph Albrizio III

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF ALFRED
JOSEPH ALBRIZIO, III**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF SUFFOLK)

ALFRED JOSEPH ALBRIZIO III, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 783 Mount Sinai-Coram Road, Mount Sinai, NY 11766.

2. My current age is 47, having been born on 1/2/1975.

3. I am the son of Alfred Joseph Albrizio Jr. upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from lung cancer and COPD on February 2, 2014. It was determined that these illnesses were causally connected to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father was my mentor. We were business partners. He taught me the jewelry business, and we intended on running our family business together. The business had been in our family for three generations. We had worked together every day since 1994. Shortly after the attack on the World Trade Center, business changed drastically for us as our store was located in the downtown area. Our whole world changed.

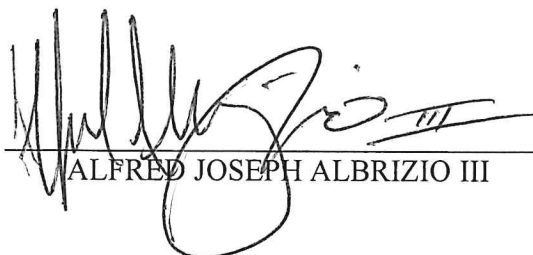
6. My father lived in a building, 3 Hanover Square, that was engulfed in smoke near the World Trade Center on 9/11/2001. They didn't have him evacuate the building. I know that there was a lot of smoke and dust that came in through the ventilation of his apartment building. We also worked near the exposure zone, a bit north of Canal Street. Our shop, C'est Magnifique, was on Houston Street. We watched the towers fall from a distance, seeing it all go down. My father lived at 3 Hanover Square for a few years. They sold their apartment, and we relocated the store because the business wasn't doing as well, and we needed lower rent to stabilize our business. It forced us to move to a different area.

7. I began to notice that my father was wheezing and having trouble breathing about six months to one year after 9/11/2001. He went in for a checkup, and the doctors saw some stuff in his lungs and started doing treatments. He was trying everything to get himself back to normal. He was diagnosed with COPD, and had to carry around an inhaler with him everywhere. Before 9/11, he was in generally good health. He didn't drink a lot, he exercised, and he took care of himself.

8. My father wasn't able to work as much as he wanted to, or as I needed him to, in order to keep the business running like usual. I was working pretty much every day. It was a lot to handle when I had to take over the business from him. His wife tried to help out, but it was hard because she didn't know the business that well. All my free time was spent towards keeping the doors of our store open. My father was typically the salesperson at the store, whereas I was behind the workbench. My father had a knack for "working the floor," selling, and dealing with people. After he became ill, our business took a huge hit. It affected my financial livelihood and stability.

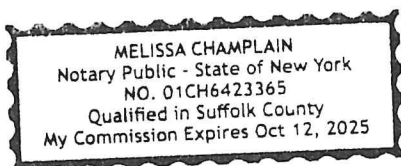
9. Emotionally, it was difficult to watch my father become sick. This was the man I spent twelve hours or more with every single day. All of that changed and the rug was yanked out from underneath me. All of our plans in life got put on hold. It was hard. His illness changed

my life drastically. Losing him was very hard. I felt like we had a lot more life to live together.
In a way, I feel robbed.


ALFRED JOSEPH ALBRIZIO III

Sworn to before me this
1 day of ~~March~~, 2022
April

Melissa Champlain
Notary Public



Catherine Albrizio

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
CATHERINE ALBRIZIO**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF ORANGE)

CATHERINE ALBRIZIO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 65 James Wilkinson Road, Rock Tavern, NY 12575

2. I am currently 65 years old, having been born on April 4, 1956.

3. I am the wife of Alfred Joseph Albrizio, Jr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from lung cancer and COPD on February 2, 2014, at the age of 66. It was determined by the World Trade Center Health Program that these illnesses were causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.

5. Alfred was my whole life. He always repaired the house and paid all the bills. I only worked part-time. We traveled a lot, went out a lot, and loved to dance. We would sometimes spontaneously go places and do things. We were getting ready to retire and get our lives together. Then, he started to become sick.

6. On September 11, 2001, Alfred and I lived at 3 Hanover Square in downtown Manhattan. I had just dropped my son Christian off at school at PS 234. When I learned of the

planes hitting the World Trade Center, I immediately went to pick up my children from school. I rushed home and closed all the windows. My husband came home from his store in Greenwich Village covered in dust. We couldn't leave our building and were more or less trapped inside. The National Guard soon came and we were basically locked in our building. I remember that all of our air conditioners were filled with dust, and we had to get them all cleaned. A few days later, when my husband did go back to work, he had to walk through the Ground Zero area. At that time, we were told the air was safe.

7. Alfred was diagnosed with pulmonary fibrosis in 2004. One day, he was acting totally out of it and not feeling well. I took him to the doctor, and they told me he had scarring on his lungs. That was his first respiratory issue. At first, they didn't know the cause of the pulmonary fibrosis. No one knew that these illnesses were linked to 9/11. He started to become short of breath in 2007. I found out about the World Trade Center Health Program at Bellevue Hospital, so I took him there. They did a CAT scan and saw a small tumor on his lung. It was a two-centimeter nodule. Our doctor sent us to NYU Langone for a bronchoscopy, where they officially diagnosed him with non-small cell lung cancer. NYU said they couldn't do anything for him. We got this devastating diagnosis and there was no follow-up. Finally, we went to Sloan Kettering, who said they could treat him with radiation. Alfred underwent forty days of radiations and several ablations. He started on chemotherapy in 2013.

8. Emotionally, I was a mess. I was depressed, angry, and scared. My whole life was wrapped around this man. I only worked fifteen hours per week. Alfred was the main source of income in the household, and because of his illness he couldn't work anymore. Soon, I had to start calling out of work to take care of him. I had to ask my son to stay home from work or school to look after his father. It was emotionally draining. I gained fifty pounds just from the stress. We were trying everything to help Alfred feel better. It was exhausting and depressing.

9. We poured money into treatments for Alfred. We ordered supplies from Canada and bought herbs from Arizona. We paid for his ozone therapy and inhalation treatments. We had blood work done that cost \$2500 out of pocket. A naturopath in Tucson sold me all these herbs to give him. I changed his whole diet, and worked with a nutritionist to get him on a sugar free raw diet. I spent probably \$700,000 trying to get him better. After his death, I threw away all the supplements that didn't do a damn thing.

10. I'm a nurse, and I was Alfred's primary caretaker. I helped him shower, prepared his meals, took him to doctors, and took him to different therapies. I tried to keep him moving. I made all the phone calls to arrange his appointments. My whole day was spent taking care of him physically and emotionally. I couldn't sleep because he would get these horrible cramps in the night and wake up in pain. It was terrible.

11. Alfred's illness and death totally ruined my life. It's been eight years since his passing and I still cry every single day. He was my whole life, and now I have no life. Since his death, I had to go back to work full-time. I'm exhausted, and now I'm sick. I am just existing, waiting to die.


CATHERINE ALBRIZIO

Sworn to before me this
21st day of March, 2022



Notary Public



Christian Albrizio

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
CHRISTIAN ALBRIZIO**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF FLORIDA)
 : SS.:
COUNTY OF ESCAMBIA)

CHRISTIAN ALBRIZIO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 54 South L Street, Pensacola, Florida 32502.

2. I am currently 29 years old, having been born on July 30, 1992.

3. I am the son of Alfred Joseph Albrizio, Jr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from lung cancer and COPD on February 2, 2014, at the age of 66. It was determined by the World Trade Center Health Program that these illnesses were causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.

5. My dad was a huge role model in my life. He owned various businesses, and I would pick his brain constantly. I wanted to own a business, just like him. He was a guide to me, and he helped me a lot in life. We would hang out all the time, go out to lunch or dinner, or just talk. We both loved baseball and spent a lot of time in the batting cages or playing catch. He was one of my best friends in life. He was always there to talk me through my own personal stressors, relationships, and struggles with school or work. We had a strong father-son

relationship. We would get each other through hard days.

6. My father was commuting to his business, a jewelry store called C'est Magnifique, when the Twin Towers came down on September 11, 2001. At first, he didn't know what was happening, so he just went about his business as usual. He heard through word of mouth that something was going on. His jewelry store was located at 120 MacDougal Street in Greenwich Village, and we lived at 3 Hanover Square at the time. He trekked for an hour through the smoke and dust to get home. My mom came to pick me up from school. At the time, I was in middle school at PS 234 (292 Greenwich Street). I remember seeing my dad get home covered in soot. My dad returned to his store the next day, on September 12th. My dad was a serious workaholic, and he was nervous about leaving his business abandoned. So, he went right back to work.

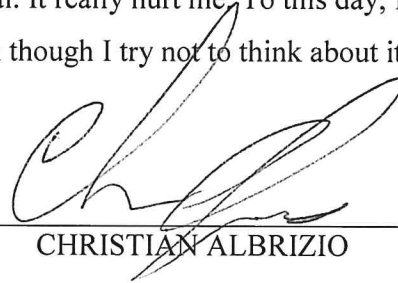
7. A few years after 9/11, my dad started to see the doctor more often. He was getting short of breath, frequently fatigued, and was even coughing up blood. We went to the hospital and he had a CAT scan. I'm not sure of the exact date, but I was in ninth grade. When we were in the car ride back from the hospital, my parents told me that my dad had cancer. I was emotionally distraught and crying. I was relieved that they told me right away because I had a feeling that something wasn't right. But it was still very tough to understand at a young age.

8. Emotionally, it was really difficult. My father's state of mind wasn't where it usually was. Normally, he was happy. But the cancer brought him down. His cancer caused arguments, financial hardship, and it brought the morale of our family down. I struggled to keep my dad emotionally stable. He was a "get-up-and-go" type of guy, he wanted to work and take care of his family.

9. It took a huge toll on me to see my father depressed and angry. In high school, I had a job on the side and was working hard to get good grades. I had to start taking care of my father once he got sick. We moved from NYC to Orange County (New York) because living in the city wasn't feasible for him anymore. I had to drive my dad four times per week into the city for his cancer treatments. Then, I'd stay with him for 8-9 hours during his treatments in the city before going home. At home, I set up his breathing apparatuses and helped him with medications and even simple tasks. Because I spent so much time caring for him, I had to quit

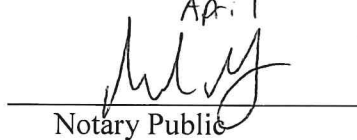
my part-time job. I also carried the emotional burden of my mother, because she was my father's full-time nurse. She never had a chance to rest, and I felt guilty. My grades started to drop in school and I became a rebel child. My dad's illness brought me down a dark path in my life. It was hard to be the emotional support for both of my parents. To this day, I still feel that emotional stress. It was a very difficult time.

10. My father's legacy impacted me the most. Every time I went to his jewelry store and helped him out, it was obvious that he was well-known and well-loved in his community. As he became more ill, I started to take over in the jewelry store. Loyal customers would come in all the time, asking me how they could help my father out. The positive encouragement was comforting, but it also hurt because it made me realize how serious my father's illness was. At home, my mom always made it seem like my dad would be fine. But talking to the customers, I could hear the concern in their voice. They knew he was truly ill and that he wasn't going to make it. The customers made his cancer feel more real. It really hurt me. To this day, I always think of him. I find him popping up in my brain, even though I try not to think about it. It's still difficult to understand.



CHRISTIAN ALBRIZIO

Sworn to before me this
7 day of ~~March~~ ^{April}, 2022



Notary Public



Alexa Burchianti

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

GERARD PATRICK AHEARN, et al.,

AFFIDAVIT OF
ALEXA BURCHIANTI

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF ORANGE)

ALEXA BURCHIANTI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 23 Chester Street, Monroe, NY 10950.

2. I am currently 49 years old, having been born on May 29, 1972.

3. I am the daughter of Alfred Joseph Albrizio, Jr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from lung cancer and COPD on February 2, 2014. It was medically determined that these illnesses were causally related to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My dad was my best friend. We were constantly doing things together as a family. He was a hard worker, and he inspired my work ethic. He owned a jewelry store called C'est Magnifique on MacDougal Street in lower Manhattan. I lived right down the block from his store and saw him every day. I later moved to Queens, and then to Orange County in 2008. He was already suffering from the cancer by then, so he sold the store and moved to Orange County with me. I have a son who is going to be 23 years old, who is my father's only grandchild.

6. My father, stepmother, and youngest brother lived in an apartment very close to the World Trade Center. They lived at 3 Hanover Square. I tried to call my dad on 9/11 when the towers came down. When I finally got in touch with them, I begged them to get out of the city. He told me, "I can't leave. Where am I supposed to go?" I told him, come stay at my house in Queens. I lived in Middle Village, which wasn't too far from the Midtown Tunnel. But my dad said no, the air is safe. I said, "No, it's not safe. You can see the particles floating in the air." It was constantly a battle. My dad went back to work right away and continued to live in lower Manhattan near Ground Zero.

7. Soon after 9/11, my dad started not breathing properly. He was constantly coughing and his lungs were hurting him. He developed asthma, COPD, and other respiratory issues. I pressed him to go to the doctor, and he finally went. I believe they took down his name for the World Trade Center Health Program (WTCHP) because he lived near Ground Zero. The WTCHP doctor was the one to find his lung cancer. When I learned of his diagnosis, I felt sick to my stomach. I thought, oh my God, I'm going to lose my father. I have a hard time talking about my dad. I couldn't even talk to him for a week after I learned about his diagnosis because I couldn't speak to him without crying.

8. His illness was a constant rollercoaster. It was so hard to watch him suffer. I was the closest with my dad. I'm like the female version of him—our personalities are so identical. People would say, Alexa, you are your father's daughter. He was always protective of me, because I was his only daughter. At the time my father started to get sick, I was going through a marital separation. I put my life and my divorce on hold to take care of my father. I wanted to be able to attend to my father when he needed me. I took him to his MRIs, PET scans, and I'd wait with him every time. My stepmother and I would take turns. When she had work, I would take him to the doctor's office, and vice versa. His condition worsened, and he started to get chronic pneumonia. He had several falls. I would constantly run over and check in on him. I was there for him nearly every day, making sure he ate, watching him, and just ensuring that he wasn't alone. I was there for him, even on the day he passed away.

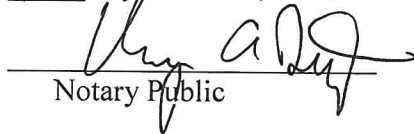
9. There are no words to express the hatred I have for those responsible for 9/11. Sometimes I go to church and pray about it. They say you're not supposed to have hatred because it will eat at you. However, I just can't find it in my heart to forgive those who took the

most important person in my life away from me. My son had to witness my father's demise at a very young age. He idolized his grandfather, they used to spend so much time together. Trips, activities, and all of that. And now, he has to continue on without his grandfather. For my father not to be able to see where I am today, and that he can't see the son that I raised, it breaks my heart, and I can never forgive that. My dad was only 66 years old when he died. It's not right. He was taken from us way too soon.



ALEXA BURCHIANTI

Sworn to before me this
28th day of March, 2022



Notary Public

KERRY A. DOUGHERTY
Notary Public, State of New York
Qualified in Orange County
Reg # 01DO5042691
Commission Expires April 24, 2023

Sheila Criss

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
SHEILA CRISS**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF DUTCHESS)

SHEILA CRISS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 67 Orchard Drive, Poughquag, NY 12570.

2. My current age is 65, having been born on May 4, 1956.

3. I am the sister of Henry Bruce Byrd, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My brother passed away from esophageal cancer on April 12, 2014. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I had a close relationship with my little brother. We were raised by our mother and stepfather. I was his only sister. We enjoyed doing things together, like traveling, going to parks or to Coney Island to ride the rides. We had good times growing up. We loved to explore New York together. When we got older, we both moved to upstate New York. We would see each other at least three times per week since we lived less than 30 minutes away from each other. Henry had a good relationship with my children as well. We loved to talk about our

family. We had a respectable relationship as siblings. We never had strong words to say to each other. It was always laughter and a good time.

6. I know that Henry went down to Ground Zero as part of the NYPD. He performed search and recovery on the pile, and also did traffic control in the area around the towers. He would comment on the horrendous conditions. He described the odor from all the fumes and the devastation of finding bodies in the rubble. He told me how his colleagues would have to go through therapy after finding bodies or body parts in the pile. It was certainly overwhelming for him and the other officers to be in that setting. Breathing became difficult for him. The governor's office said the air was clean, so they went without protection. Henry worked at the World Trade Center site every day for several months.

7. By the time he got sick, Henry had already retired and moved to Florida. He complained to me that his throat was always sore and that he was having sinus issues. I hadn't noticed much of a change in his condition, except for some weight loss and fatigue. It continued to worsen, and after seeing his doctor, he was diagnosed with GERD and sinusitis. After undergoing many MRIs and CT scans, Henry was diagnosed with esophageal cancer. He was devastated by the news and, frankly, so was I. Especially since at first, he thought it was just a simple sore throat. My children were upset by the news, too. When we first went to visit Henry after he started to become sick, my younger son was shocked when he saw him. He ran into the bathroom in tears because he didn't expect to see him that way.

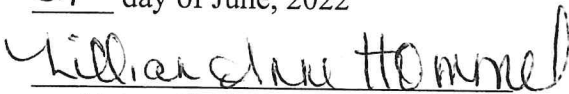
8. Henry struggled with esophageal cancer for three years. He confided in me that he didn't pick up calls from old friends or colleagues anymore. He was in denial, and as much as I wanted to be, just looking at him made it so obvious. He was a sick man who suffered a lot and it was heartbreaking see him deteriorate. I just kept remembering all the things we did as kids and how active and alive he was. When the cancer spread to his kidneys, his whole body became swollen. He went through all sorts of treatment – chemotherapy, radiation. None of it worked. I dropped everything to care for Henry. I was ready to care for him for the rest of his life, however long it would take. But he didn't last for long.

9. I had four brothers in my family, and Henry and I were the last ones. He and I relied on each other because everyone else was gone. I was devastated to lose him. Other than my own kids and husband, I have no other family. I was so proud of Henry when he became a police officer. As his older sister, I felt like I had taken the place of our mother. I wanted to

protect Henry and watch over him. To stand at his grave site, I felt like I was all alone. I felt as though I was robbed by the events of 9/11. Never again will I be able to sit with Henry and say, "Remember the good times we had growing up?" Now all I have are the bittersweet memories, and I cherish them. All the branches of my family are gone. I lost everything by losing him. I lost everything because he was the last one left in our family. He was a sweetheart who always knew how to make everyone around him feel good. To say that heaven recalled one of its "finest," is truly an understatement. I miss him terribly.


SHEILA CRISS

Sworn to before me this
21 day of June, 2022


Notary Public

